

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

December 7, 2021

The Honorable Sarah Netburn
 Thurgood Marshall United States Courthouse
 40 Foley Square, Room 430
 New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

Plaintiffs who asserted claims against the Kingdom of Saudi Arabia pursuant to the Consolidated Amended Complaint at ECF No. 3463 (the “CAC Plaintiffs”) have filed a Motion pursuant to Fed. R. Civ. P. 54(b) and this Court’s inherent powers, requesting that the Court grant certain relief in light of the Second Circuit Court of Appeals’ decisions in *Kaplan v. Lebanese Canadian Bank*, 999 F.3d 842 (2d Cir. 2021) and *Honickman v. BLOM Bank SAL*, 6 F.4th 487 (2d Cir. 2021). See ECF Nos. 7431-7432. The CAC Plaintiffs and Saudi Arabia have conferred, and respectfully request that the Court endorse the following briefing schedule for the motion:

1. The Kingdom of Saudi Arabia’s Opposition to the CAC Plaintiffs’ Motion will be filed on or before February 7, 2022; and
2. The CAC Plaintiffs’ Reply in Support of their Motion will be filed on or before March 9, 2022.

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The parties thank Your Honor in advance for the Court's consideration of this request.

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Sean P. Carter

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On behalf of the CAC Plaintiffs

MOTLEY RICE LLC

By: /s/ Robert T. Haefele

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On behalf of the CAC Plaintiffs

cc: The Honorable George B. Daniels (via ECF)
All MDL Counsel of Record (via ECF)